

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GOLDSTONE FINANCIAL GROUP, LLC
and ANTHONY PELLEGRINO,

Plaintiffs,

v.

FINANCESCAM.COM

Defendant.

Case No. 1:25-cv-07283-SRH

JURY TRIAL DEMANDED

MOTION FOR ENTRY OF DEFAULT

Plaintiffs Goldstone Financial Group, LLC and Anthony Pellegrino respectfully move for entry of default against Defendant FinanceScam.com pursuant to Fed. R. Civ. P. 55(a).

Rule 55(a) states “[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.” Plaintiffs, through counsel, properly served the Complaint on Defendant FinanceScam on July 15, 2025. (Saul Decl. ¶ 2.) The certificate of service is available at ECF 14.

Federal Rule of Civil Procedure 12(a)(1)(A) states that a defendant must answer or otherwise respond “within 21 days after being served with the summons and complaint.” FinanceScam’s response deadline was Tuesday, August 5, 2025. Despite repeatedly acknowledging this lawsuit, it failed to plead or otherwise respond by this deadline. (Ex. A – Aug. 7 email from FinanceScam; Saul Decl. ¶ 4.) FinanceScam is not an infant, in the military,

or an incompetent person.¹ (Saul Decl. ¶ 5.) Accordingly, Plaintiffs are entitled to an entry of default.

Consistent with the Court's individual Case Procedures, Plaintiffs have submitted a proposed order to chambers contemporaneously with this filing.

Dated: August 13, 2025

/s/ James J. Saul

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¹ See <https://www.ilnd.uscourts.gov/PrintContent.aspx?cmpid=876> (default judgments).